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September 9, 2024

**BY ECF**

The Honorable Leonard P. Stark  
United States District Court  
for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, Delaware 19801-3570

**Re: *Crystallex International Corporation v. Bolivarian Republic of Venezuela,***  
**D. Del. C.A. No. 1:17-mc-00151-LPS**

Dear Judge Stark:

I write on behalf of my client Gramercy Distressed Opportunity Fund LLC (“Gramercy”) in response to the Special Master’s Motion to Expedite Briefing and Consideration of the Special Master’s Motion to Enjoin the Alter Ego Claimants from Enforcing Claims Against the Republic or PDVSA by Recovering from PDVSA or Its Subsidiaries in Other Forums (D.I. 1251) (the “Motion to Expedite”). Gramercy will be opposing the Motion to Expedite and is planning to submit its opposition briefing tomorrow, September 10, 2024.

Respectfully submitted,

*/s/ Theodore A. Kittila* (DE Bar No. 3963)

Theodore A. Kittila, Attorney at Law  
Halloran Farkas + Kittila LLP

*Counsel for Gramercy Distressed Opportunity  
Fund LLC*

cc: Counsel of Record (By ECF)